

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOSEPH LAWRENCE CURRY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 04-175-JJF
)	
GREGORY HOPKINS,)	
)	
)	
Defendant.)	

**NOTICE OF MOTION:
PLAINTIFF'S COMBINED MOTION FOR DEFAULT JUDGMENT AND OTHER
SANCTIONS FOR DISCOVERY VIOLATIONS AND MOTION TO COMPEL**

Pursuant to the Procedure for Filing non-case dispositive motions in non-patent cases, the Plaintiff hereby notices its Motion to Compel, or in the Alternative, for a Finding of Contempt, for September 13, 2008, at 2:00 p.m.

Date: June 20, 2008	Respectfully submitted, CONNOLLY BOVE LODGE & HUTZ LLP <i>/s/ Brian R. Lemon</i> Brian R. Lemon (#4730) Scott E. Swenson (#4766) The Nemours Building 1007 North Orange Street P.O. Box 2207 Wilmington, Delaware 19899-2207 Telephone: 302-888-6319 Facsimile: 302-658-5614 blemon@cblh.com
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CERTIFICATE OF SERVICE

I, Brian R. Lemon, Esq., hereby certify that on June 20 2008, a copy of the foregoing:

**NOTICE OF MOTION:
PLAINTIFF'S COMBINED MOTION FOR DEFAULT JUDGMENT AND OTHER
SANCTIONS FOR DISCOVERY VIOLATIONS AND MOTION TO COMPEL**

was caused to be served upon the following:

BY U.S. MAIL AND FACSIMILE

Daniel Griffith, Esquire
Whiteford Taylor & Preston
1220 N. Market Street
Suite 608
Wilmington, DE 19801

/s/ Brian R. Lemon
Brian R. Lemon (# 4730)